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13	UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA  SAN FRANCISCO DIVISION	
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16		
17	In re TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION	Master Docket No. 07-m-1827 SI
18	This Document Relates To:	STIPULATION AND [PROPOSED]
19	Motorola Mobility, Inc. v. AU Optronics	ORDER EXTENDING PARTIES' TIME TO MOVE TO COMPEL AS
20	Corporation, et al., C 09-5840 SI	TO CERTAIN DISCOVERY
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The undersigned Defendants in the above captioned-action and Plaintiff Motorola Mobility, Inc. ("Motorola") stipulate as follows:

WHEREAS various Defendants have served discovery on Motorola prior to October 31, 2011 seeking discovery of the basis for Motorola's contentions in its complaint regarding Defendants' participation in a conspiracy to affect the price of LCDs, to which Motorola has served responses and objections ("Contention Discovery"), and Defendants also served discovery requests related to other subjects, to which Motorola has served responses and objections;

WHEREAS the parties have been in negotiations regarding an extension of time for Motorola to supplement certain responses to the previously served discovery and to update its chart of conspiracy evidence it served on May 24, 2011 as "Attachment A" to its responses to certain discovery requests;

WHEREAS Motorola may serve supplemental responses to discovery requests served by any Defendant not joining this Stipulation and this Stipulation is without prejudice to (a) Motorola's ability to do so; or (b) the positions of any party not joining this stipulation with respect to any such supplemental responses;

NOW THEREFORE, the parties stipulate and agree as follows:

- 1. Motorola will serve an updated Attachment A to include any supplemental responses to the Contention Discovery by January 30, 2012 and the undersigned Defendants shall have until March 1, 2012 to file motions to compel with respect to any supplemented responses; and
- 2. Motorola will serve any supplemental responses it intends to provide related to subjects other than the Contention Discovery by January 20, 2012, and undersigned Defendants shall have until February 10, 2012 to file motions to compel with respect to any supplemented responses.

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1.	Dated: December 28, 2011	
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## Dated: December 28, 2011 1 By: /s/ Ramona Emerson 2 **K&L GATES LLP** Hugh F. Bangasser, Esq. 3 Ramona Emerson, Esq. 925 Fourth Avenue, Suite 2900 Seattle, WA 98104-1158 Tel: (206) 623-7580 Fax: (206) 623-7022 6 Counsel for Defendants Hannstar Display Corporation 7 8 Dated: December 28, 2011 By: /s/ Michael R. Lazerwitz 9 CLEARY GOTTLIEB STEEN & HAMILTON LLP 10 Michael R. Lazerwitz, Esq. Lee F. Berger, Esq. 11 Kelsey W. Shannon, Esq. 2000 Pennsylvania Avenue N.W. 12 Washington, DC 20006 Tel: (202) 974-1500 13 Fax: (202) 974-1999 14 Counsel for Defendants LG Display America, Inc. and LG Display Co., Ltd. 15 16 Dated: December 28, 2011 By: /s/ Brendan P. Cullen 17 SULLIVAN & CROMWELL LLP Garrard R. Beeney, Esq. 18 Theodore Edelman, Esq. 125 Broad Street 19 New York, NY 10004-2498 Tel: (212) 558-4000 20 Fax: (212) 558-3588 21 Brendan P. Cullen, Esq. Shawn J Lichaa, Esq. 22 1870 Embarcadero Road Palo Alto, CA 94303 23 Tel: (650)461-5600 Fax: (650) 461-5745 24 Counsel for Defendants Philips Electronics 25 North America Corporation 26 27 28

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